### IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

DANNY R. TEAGLE and JESUS	§	
SALAZAR, JR., individually and on	§	
behalf of all others similarly	§	
situated,	§	
	§	
Plaintiffs,	§	
	§	No. 1:11-CV-1280-RWS-JSA
<b>v.</b>	§	
	§	
LEXISNEXIS SCREENING	§	
<b>SOLUTIONS, INC., formerly</b>	§	
known as CHOICEPOINT'S	§	
WORKPLACE SOLUTIONS, INC.,	§	
, ,	§	Jury Trial Demanded
Defendant.	§	v

## **JOINT STATUS REPORT**

Pursuant to the Court's Order granting the Parties' Consent Motion to Stay Deadlines to Complete Settlement Negotiations (Dkt. No. 70), Plaintiffs Danny R. Teagle and Jesus Salazar, Jr. and Defendant LexisNexis Screening Solutions, Inc. file this Joint Status Report regarding the progress of their settlement negotiations. The Parties respectfully show the Court the following:

The Parties have agreed on the principal deal points of a settlement for both the 1681k Notice and FCRA Obsolete Information Classes (Dkt. No. 55 ¶¶ 42, 44), and are finalizing the documents and exhibits comprising the agreement—which

provides for all aspects of the class action settlement process, including details of the release of claims, proposed notice program and accompanying processes of objecting and exclusion for Class Members, and distribution of settlement funds. The Parties expect to file the final documents for preliminary approval on or before January 31, 2013.

Accordingly, the Parties respectfully request that the Court continue the stay of all pending deadlines so that the Parties may complete their settlement negotiations and attendant discovery, and briefing of the settlement for presentation to the Court for formal approval. Further, they ask for the Court's leave to present the final documents for preliminary approval no later than January 31, 2013.

Dated: December 14, 2012.

We consent to the relief requested in this Motion:

/s/ Michael A. Caddell
Michael A. Caddell (pro hac vice)
Cynthia B. Chapman (pro hac vice)
Craig C. Marchiando (pro hac vice)
CADDELL & CHAPMAN
1331 Lamar, Suite 1070
Houston TX 77010
(713) 751-0400
(713) 751-0906 (fax)

Leonard A. Bennett (pro hac vice)

/s/ James F. McCabe
James F. McCabe (pro hac vice)
MORRISON & FOERSTER LLP
425 Market St., 32nd Floor
San Francisco, CA 94105
Telephone: (415) 268-7000
Facsimile: (415) 268-7522
jmccabe@mofo.com

Jill A. Pryor Alison B. Prout

# CONSUMER LITIGATION ASSOCIATES P.C.

12515 Warwick Boulevard, Suite 100 Newport News, VA 23606

Mara McRae Georgia Bar No. 499138 MCRAE BROOKS WARNER LLC 1175 Peachtree Street, Suite 2100 Atlanta, Georgia 30361 (404) 681-0700 (404) 681-0780 (fax)

Counsel for Plaintiffs

BONDURANT, MIXSON & ELMORE, LLP 3900 One Atlantic Center 1201 West Peachtree St. N.W. Atlanta, GA 30309 Telephone: (404) 881-4100 Facsimile: (404) 881-4111 pryor@bmelaw.com prout@bmelaw.com

Counsel for Defendant LexisNexis Screening Solutions, Inc.

## **CERTIFICATE OF COMPLIANCE**

The foregoing document complies with the typeface requirements of Local Rule 5.1C and the type style requirements of Local Rule 5.1C(3) using Times New Roman 14 point font.

/s/ Michael A. Caddell
Michael A. Caddell (pro hac vice)
Cynthia B. Chapman (pro hac vice)
Craig C. Marchiando (pro hac vice)
CADDELL & CHAPMAN
1331 Lamar, Suite 1070
Houston TX 77010
(713) 751-0400
(713) 751-0906 (fax)

Counsel for Plaintiff

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following:

James F. McCabe (pro hac vice) MORRISON & FOERSTER LLP 425 Market St., 32nd Floor San Francisco, CA 94105 Telephone: (415) 268-7000

Facsimile: (415) 268-7522 jmccabe@mofo.com

Jill A. Pryor Alison B. Prout BONDURANT, MIXSON & ELMORE, LLP 3900 One Atlantic Center 1201 West Peachtree St. N.W. Atlanta, GA 30309

Telephone: (404) 881-4100 Facsimile: (404) 881-4111

pryor@bmelaw.com prout@bmelaw.com

Counsel for Defendant LexisNexis Screening Solutions, Inc.

> /s/ Craig C. Marchiando Craig C. Marchiando

Counsel for Plaintiffs